

NO. 137, ORIGINAL

IN THE SUPREME COURT OF THE UNITED STATES

STATE OF MONTANA, )  
 )  
 Plaintiff, )  
 )  
 vs. ) No. 220137 ORG  
 )  
 STATE OF WYOMING and )  
 )  
 STATE OF NORTH DAKOTA, )  
 )  
 Defendants. )  
 )

TRANSCRIPT OF TELEPHONIC PROCEEDINGS

STATUS CONFERENCE

November 28, 2011

Reported by: Antonia Sueoka, RPR, CSR No. 9007

## 1 TELEPHONIC APPEARANCES:

2  
3 SPECIAL MASTER BARTON H. THOMPSON, JR.

4 STANFORD UNIVERSITY

5 JERRY YANG AND AKIKO YAMAZAKI

6 ENVIRONMENT &amp; ENERGY BUILDING, MC-4205

7 473 Via Ortega

8 Stanford, California 94305

9 605.721.1488

10 susan.carter@stanford.edu

11  
12  
13 FOR THE STATE OF MONTANA:

14 MONTGOMERY &amp; ANDREWS, P.A.

15 BY: JOHN B. DRAPER

16 JEFFREY J. WECHSLER

17 SPECIAL ASSISTANT ATTORNEYS GENERAL

18 325 Paseo de Peralta

19 Santa Fe, New Mexico 87501

20 505.982.3873; Fax 505.982.4289

21 jdraper@montand.com

22 jwechsler@montand.com

23

24

25

## 1 TELEPHONIC APPEARANCES (CONTINUED)

2  
3 FOR THE STATE OF MONTANA:

4 MONTANA ATTORNEY GENERAL'S OFFICE

5 BY: JENNIFER ANDERS

6 ASSISTANT ATTORNEY GENERAL

7 215 North Sanders

8 Helena, Montana 59620-1401

9 406.444.5894; Fax 406.444.3549

10  
11  
12 FOR THE STATE OF WYOMING:

13 WYOMING ATTORNEY GENERAL'S OFFICE

14 BY: PETER K. MICHAEL

15 CHIEF DEPUTY ATTORNEY GENERAL (Counsel of Record)

16 DAVID WILLMS, SENIOR ASSISTANT ATTORNEY GENERAL

17 JAY JERDE, DIVISION CHIEF

18 ANDREW KUHLMANN, ASSISTANT ATTORNEY GENERAL

19 200 West 24th Street

20 123 Capitol Building

21 Cheyenne, Wyoming 82002

22 307.777.7841; Fax 307.777.6869

23 pmicha@state.wy.us

24 dwillm@state.wy.us

25 akuhlm@state.wy.us

## 1 TELEPHONIC APPEARANCES (CONTINUED)

2  
3 FOR THE STATE OF NORTH DAKOTA:

4 NORTH DAKOTA ATTORNEY GENERAL'S OFFICE

5 BY: JENNIFER VERLEGER

6 ASSISTANT ATTORNEY GENERAL

7 500 North Ninth Street

8 Bismarck, North Dakota 58501

9 710.328.2210

10 tsattler@nd.gov

11 jverleger@nd.gov

12  
13  
14 FOR AMICUS THE UNITED STATES:

15 UNITED STATES DEPARTMENT OF JUSTICE

16 ENVIRONMENT &amp; NATURAL RESOURCES

17 DIVISION OF NATURAL RESOURCES SECTION

18 JAMES J. DUBOIS, ESQUIRE

19 1961 Stout Street, 8th Floor

20 Denver, Colorado 80294

21 303.844.1375; james.dubois@usdoj.gov

22

23

24

25

## 1 TELEPHONIC APPEARANCES (CONTINUED)

2  
3 FOR AMICUS NORTHERN CHEYENNE TRIBE:

4 BY: JEANNE S. WHITEING, ESQUIRE

5 1628 5th Street

6 Boulder, Colorado 80302

7 jwhiteing@whiteinglaw.com

8  
9  
10 FOR AMICUS ANADARKO PETROLEUM COMPANY:

11 BINGHAM, McCUTCHEN, LLP

12 BY: MICHAEL B. WIGMORE, ESQUIRE

13 2020 K Street N.W.

14 Washington, D.C. 20006

15 202.373.6000

16 michael.wigmore@bingham.com

17  
18  
19  
20 TELEPHONIC STATUS HEARING,

21 reported at Kramm Court Reporting, San Diego, California

22 92101, commencing on Monday, November 28, 2011, at

23 8:33 a.m. before Antonia Sueoka, Certified Shorthand

24 Reporter, CSR No. 9007, RPR, in and for the state of

25 California,

1 MONDAY, NOVEMBER 28, 2011, 8:33 A.M.

2 - - -

3 SPECIAL MASTER THOMPSON: So why don't we, then,  
4 go on the record and start by identification of counsel.

5 So counsel for Montana.

6 MR. DRAPER: Yes, Your Honor. Good Morning.  
7 This is John Draper. Jeff Wechsler is here with me in  
8 Santa Fe, and we also have Jennifer Anders in Helena.

9 SPECIAL MASTER THOMPSON: Thank you.

10 Counsel for Wyoming.

11 MR. MICHAEL: Your Honor, this is Peter Michael.  
12 There are four of us here. Besides me, David Willms, Jay  
13 Jerde, and Andrew Kuhlmann.

14 SPECIAL MASTER THOMPSON: Okay. Thank you.

15 Anyone -- is counsel for North Dakota on the  
16 line?

17 MS. VERLEGER: Jennifer Verlerger, and I'm all by  
18 myself.

19 SPECIAL MASTER THOMPSON: Okay. You seem to do a  
20 good job all by yourself.

21 MS. VERLEGER: Thank you.

22 SPECIAL MASTER THOMPSON: And is anyone on the  
23 line for Northern Cheyenne?

24 MS. WHITEING: Yes, Your Honor. This is Jeanne  
25 Whiteing for the Northern Cheyenne Tribe.

1           SPECIAL MASTER THOMPSON:   Okay.   Good morning,  
2   Ms. Whiteing.

3           MS. WHITEING:   Good morning.

4           SPECIAL MASTER THOMPSON:   Anadarko?

5           MR. WIGMORE:   Yes, Your Honor.   This is Michael  
6   Wigmore for Anadarko.

7           SPECIAL MASTER THOMPSON:   Okay.   And then,  
8   finally, Mr. DuBois, you're on the line, I assume, for the  
9   United States.

10          MR. DUBOIS:   Yes, I am.   Thank you, Your Honor.  
11   Good morning, Your Honor.

12          SPECIAL MASTER THOMPSON:   And is there anyone who  
13   has not been identified who is on the line?

14          Okay.   If not, then what I would propose in the  
15   way of an agenda this morning is that we can start out  
16   with the motions and hearings that were conducted just  
17   about two months ago now and the status and any follow-up  
18   on those; then we can move from there to the Document  
19   Production Order; from there to the Case Management Plan,  
20   which hopefully we can finalize, because I think we're  
21   almost there; and then finally, I'll just open it up to  
22   any other matters that the parties or Amici might want to  
23   raise at that point.

24          So is there anyone that would like to modify that  
25   agenda?

1           Okay. Then, if not, then let's start with  
2 Wyoming's motion for partial summary judgment and also the  
3 hearing on Montana's Article 5(b) claims.

4           I did receive the parties' suggested  
5 clarifications and modifications to the Memorandum Opinion  
6 that I issued in a draft form, and I thought that the  
7 parties' points were all valid ones. I have revised the  
8 Memorandum Opinion in light of those comments. And as  
9 soon as Susan Carter is back, we will circulate final  
10 versions of those opinions around to everyone.

11           Again, the bottom lines have not changed, but I  
12 have modified some of the language in light of the  
13 suggestions and comments of the two parties.

14           I also have taken a look at the resolution -- or  
15 the agreement as to a schedule for continuing and  
16 resolving Montana's motion for partial summary judgment.  
17 So this is what is set out as a schedule on Page 2 of the  
18 parties' letter of November 22, 2011, and all of those  
19 dates look fine to me.

20           Also, I agreed that given that the purpose of  
21 resolving that motion is so that the parties may not need  
22 to go to the same lengths and cost with respect to their  
23 expert reports, that it is important to provide some time  
24 between when that motion will be heard again and when the  
25 expert reports need to be disclosed. So I'm also fine

1 with the proposed dates for the disclosure of Montana and  
2 Wyoming's expert reports of Montana's rebuttal expert  
3 reports.

4 I would propose that -- just so that we have a  
5 date on the calendar -- and I realize that we might need  
6 to change this date because of any matters that come up,  
7 such as people's vacation time, but hopefully we can keep  
8 this -- I would propose that we have a hearing on Friday,  
9 August 3rd. So that's basically a week after Wyoming  
10 would file its reply in support of the renewed motion.

11 So does anyone see a problem with that date right  
12 now? If not, as I say, I would like to just set that as a  
13 tentative date so at least we have a date on the calendar.

14 MR. DRAPER: Your Honor, this is John Draper.  
15 That Saturday I think we are thinking that we will have a  
16 reception for our daughter's wedding. Anyway, I just  
17 wanted to mention that as a possible problem for me  
18 personally, but ...

19 SPECIAL MASTER THOMPSON: Then -- number one,  
20 congratulations to you and your daughter.

21 MR. DRAPER: Thank you.

22 SPECIAL MASTER THOMPSON: Would it help if we  
23 held the motion earlier in the week?

24 MR. DRAPER: Yes. Staying away from either that  
25 Saturday or the Saturday before would be good. So if we

1 did it in the middle of the week, if we needed to do it at  
2 that time, that would be helpful.

3 SPECIAL MASTER THOMPSON: I'm just thinking that  
4 it would be useful again to have that hearing as soon as  
5 possible so that I can make a final ruling and both you  
6 and Wyoming can take that into account in your expert  
7 reports, so I prefer not to put it off for too long.

8 And so I'm just looking at my own calendar at the  
9 moment.

10 So if we did that on, say, Wednesday, August the  
11 1st -- recognizing -- again, I realize that things can  
12 change between now and August of next year -- but does  
13 that look like it would be doable for people?

14 MR. MICHAEL: That's fine with Wyoming, Your  
15 Honor.

16 SPECIAL MASTER THOMPSON: Great.

17 Then what I will do is I will tentatively  
18 calendar the hearing for Wednesday, August the 1st,  
19 recognizing, again, that various things might come up that  
20 will make that a difficult day for one or another of the  
21 key counsel in the case. And my only request would be  
22 that counsel could let me know as soon as that appears to  
23 be a problem so that we can reschedule it.

24 And Mr. Draper, I thinking in particular, if I  
25 had an event like that, my wife would definitely want me

1 to check with her. So feel free to check with your wife.  
2 And if she says no under no circumstances is that date  
3 okay, let me know right away.

4 MR. DRAPER: Thank you very much, Your Honor.

5 SPECIAL MASTER THOMPSON: Okay. And so I think,  
6 as I say, that takes care of the status of the Memorandum  
7 Opinion and also the continuation of Wyoming's motion for  
8 partial summary judgment.

9 On the Article 5(b) claims, as we discussed  
10 during the last status conference, obviously the  
11 Memorandum Opinion leaves open the right of Montana to  
12 file -- or to petition to amend its complaint, which  
13 obviously is a right that Montana already -- always had.

14 And Mr. Draper, I was just wondering on if  
15 Montana has any thoughts on whether it is likely to file  
16 such petition.

17 MR. DRAPER: Your Honor, this is John Draper.  
18 Montana has not made a decision about that at this time.  
19 We're considering it, but we're not in a -- we simply have  
20 not made a decision yet.

21 SPECIAL MASTER THOMPSON: Okay. That's fine. I  
22 just, as I said, I just wanted to check to see whether or  
23 not you had made a tentative decision one way or the -- or  
24 the other.

25 So those were the only things I wanted to address

1 in connection to the follow-up to the hearings and the  
2 Memorandum Opinion.

3 Is there any other subject in connection with  
4 those that we need to discuss this morning?

5 Okay. Then the next subject is the Document  
6 Production Order. And I have also reviewed the parties'  
7 joint letter with respect to this and was pleased to see  
8 that the parties had -- had reached an agreement.

9 And I guess I have only one question on this.  
10 This is something that I probably should have noticed  
11 earlier, but -- and just curious about.

12 In connection with the documents to be produced,  
13 I noticed that the production is with respect to -- well,  
14 documents that were written, developed, or created prior  
15 to February 1st, 2007, which I assume basically coincides  
16 with the dates that Montana filed its -- or -- yeah, filed  
17 its petition to speak to, then filed its complaint; is  
18 that correct?

19 MR. MICHAEL: Your Honor, this is Pete Michael.  
20 And that's right. And I know we discussed that -- Jeff  
21 Wechsler and I discussed that, and the idea there was, of  
22 course, to not have ongoing operations of the two states  
23 be subject to discovery or the case never -- discovery  
24 never closes, in a sense, to have a clear end date on when  
25 we have to seek documents.

1           SPECIAL MASTER THOMPSON:   Okay.

2           MR. WECHSLER:   Your Honor, this is Jeff Wechsler,  
3 and I would concur with the statement that Mr. Michael  
4 made, but I would also point out that we -- both states  
5 have reserved the right amongst ourselves to ask for  
6 documents that we believe are relevant after that date.

7           SPECIAL MASTER THOMPSON:   Okay.   That's helpful.

8           And so both Montana and Wyoming are fine with  
9 using that date, but I gather that Montana is not in the  
10 process precluding asking for damages for dates after  
11 February 1?

12          MR. DRAPER:   That would be correct, Your Honor.

13          SPECIAL MASTER THOMPSON:   That was, as I say, the  
14 only question that -- that I had.   And I think I have one  
15 change of changing of "the" in the document to an "an,"  
16 but otherwise I will go ahead and approve the joint  
17 proposed Document Production Order and issue that, again,  
18 as soon as Susan Carter is back later this week.

19          Okay.   So anything else with respect to the  
20 Document Production Order?

21          Okay.   So then we come to the Case Management  
22 Plan.   So this is the draft that I have circulated on  
23 September 28th of this year.   And there are three things I  
24 wanted to do with respect to this document.

25          The first one is to talk in a little bit more

1 detail about the dates that are currently in this  
2 document. The second thing is to then address the letter  
3 from Mr. Wigmore regarding his concerns on behalf of  
4 Anadarko Petroleum Corporation, and then third just to see  
5 if there's any other issues that anyone wants to raise  
6 with respect to that proposed Case Management Plan.

7 So as I said, the first thing I want to do is  
8 just talk about dates. So looking at Appendix A, if you  
9 have the draft Case Management Plan in front of you, this  
10 is the appendix which lists discovery dates and deadlines.

11 The very first date that was in the proposed plan  
12 was for initial disclosures and also the date when written  
13 discovery could begin and depositions could be noticed.

14 It was originally set for December 2nd, 2011, but  
15 recognizing both the delay that was necessitated by the  
16 two hearings and also to allow Mr. Draper some quality  
17 time to, well, recover from his surgery and the  
18 recognition the holidays are coming up, as I mentioned in  
19 the last Case Management Order, what I'm going to do is to  
20 delay that to January 16, 2012.

21 Then we have the disclosures of the expert  
22 reports and the rebuttal expert reports. Those will be  
23 modified as suggested by counsel for the States. So now  
24 they will be October 19th, 2012, November 16th, 2012, and  
25 December 7th, 2012. That delays everything by,

1 effectively, two months.

2 So I would also, then, propose changing the last  
3 day for propounding written discovery to December 21st,  
4 2012, and then the last day for depositions would be  
5 delayed to January 25th, 2013.

6 And then the one date that is included in the  
7 Case Management Plan that is not on this list is the last  
8 day for motions, which is provided in Paragraph 9, which  
9 is on Page 17. So this is -- the paragraph says: "Unless  
10 otherwise ordered by the Special Master . . .," then going  
11 on, "Motions may be filed at any time up to and until  
12 March 15, 2000" -- I'm sorry, right now January 18th,  
13 2013, and I would propose we change that to March 15,  
14 2013.

15 So basically, I'm taking the suggestion of the  
16 parties that we move the disclosures back two months and  
17 basically moving everything else back by approximately the  
18 same length of time.

19 So any thoughts on those dates?

20 Okay. Then the next thing is the letter from  
21 Mr. Wigmore regarding the Case Management Plan and how it  
22 deals with Amici in connection with discovery.

23 And as I understand your letter, Mr. Wigmore,  
24 there's really, I guess, a total of four different issues  
25 raised in the letter, although obviously some of these

1 overlap.

2 The first is that you would like to see the Case  
3 Management Plan provide that where an Amicus has a  
4 representative of itself being deposed, that it have the  
5 right to examine the deponent.

6 The second issue is that you would like to make  
7 it clear that to the degree that there is a discovery  
8 dispute, that the same approach for remedying those  
9 discovery disputes would apply to Amici as it does right  
10 now to the States.

11 The third point, which is similar, is that the  
12 provisions with respect to the length of a deposition  
13 should be the same whether or not the deponent is a  
14 representative of one of the States or of one of the  
15 Amici.

16 And then the final point is that to the degree  
17 that the Case Management Plan buries the deadline that  
18 would otherwise apply under the Federal Rules of Civil  
19 Procedure for responding or objecting to, well, discovery,  
20 that those deadlines should apply across the board and not  
21 simply to the States.

22 Is that correct? And do you have anything else  
23 you wanted to add to the letter?

24 MR. WIGMORE: No, Your Honor, that's essentially  
25 it. I mean, I don't believe that we specifically raised

1 the issue relating to length of the depositions, only  
2 that -- you know, because the order will change the  
3 Federal Rules of Civil Procedure in some ways, that to the  
4 extent there are remedies that are available with the  
5 Special Master, that those should be available to Amici as  
6 well if Amici are served with the discovery.

7 SPECIAL MASTER THOMPSON: Right. I'm sorry, I  
8 misspoke.

9 So counsel for any of the parties, any response  
10 to or thoughts about Mr. Wigmore's points?

11 MR. DRAPER: Your Honor, this is John Draper.  
12 We've looked over Mr. Wigmore's letter, and we don't have  
13 any objection to his proposed changes.

14 SPECIAL MASTER THOMPSON: Okay.

15 MR. MICHAEL: Your Honor, Pete Michael. None  
16 from Wyoming either.

17 MS. VERLEGER: None from North Dakota.

18 SPECIAL MASTER THOMPSON: Thank you.

19 I guess my only question then is that  
20 Mr. Wigmore's suggested modifications all deal with the  
21 Amici. And one of my questions is whether or not any of  
22 the proposed changes that Mr. Wigmore suggests should be  
23 more generally applicable to anyone rather than simply  
24 Amici.

25 And I'm just thinking, for example, to the degree

1 that you -- you know, that either Montana or Wyoming were  
2 to decide to -- or try to depose somebody other than a  
3 representative of Anadarko, maybe it's a representative of  
4 another petroleum company working in the area, and they  
5 had a dispute with respect to -- well, the discovery,  
6 could it be made clear in the Case Management Plan that  
7 resolution of those disputes would be handled as provided  
8 in the Case Management Plan no matter who is representing  
9 the deponent.

10 I know that's a new point. I don't know whether  
11 you have any thoughts on that, but it was the only  
12 question I had when I was reading this.

13 MR. DRAPER: Your Honor, this is John Draper. My  
14 initial reaction is very positive, that -- to the extent  
15 that there is, say, a deposition of a representative of a  
16 third party who is not an Amicus, that providing, say,  
17 protections that Mr. Wigmore has suggested here would be  
18 appropriate.

19 SPECIAL MASTER THOMPSON: Mr. Michael, any  
20 thoughts?

21 MR. MICHAEL: I guess the -- well, what I haven't  
22 thought of too much is what kind of rights a -- an  
23 attorney for a third party. Let's say we're deposing an  
24 irrigation district officer that's not a representative of  
25 Montana, and what kind of -- how much -- how much activity

1 could an attorney for that irrigation district engage in,  
2 how much could they be raising objections.

3 That's the one that is just jumping into my mind.  
4 I don't have a -- I don't know what the solution is to  
5 that one necessarily, but it's what I'm thinking about  
6 that may be a little different.

7 SPECIAL MASTER THOMPSON: Yeah. I mean, my  
8 thought on this was really to go to the paragraphs on the  
9 second page of Mr. Wigmore's letter. So these are the  
10 ones that relate to, number one, how discovery disputes  
11 are resolved.

12 Second of all, to the degree that somebody  
13 considers that the amount of time for a proposed  
14 deposition is unreasonable, how it is to be resolved.

15 And then I think, finally, the question of what  
16 the period of time is to respond to -- well, to written  
17 discovery. And the question is whether or not we  
18 either -- I guess there's three -- three possibilities.

19 One is that in trying to address those things, if  
20 you are not an Amicus or party, then you're back in the  
21 Federal Rules of Civil Procedure, which seems a little bit  
22 odd to have two tracks, but I'm perfectly willing to  
23 consider that. The second is that we just don't address  
24 it, which I think is probably bad policy. The third is  
25 that we just decide that these procedures that we set out

1 are the procedures for the proceeding as a whole and  
2 aren't just applicable to the parties themselves.

3 MR. MICHAEL: Well, Your Honor, this is Pete  
4 Michael again. I think I -- on those issues I favor  
5 uniformity, and I favor having -- not having to run to  
6 separate Federal Courts and explain the whole situation  
7 when we have a discovery problem. I'd much prefer to have  
8 it centralized with you.

9 SPECIAL MASTER THOMPSON: Yep. So I would  
10 propose that on those three -- I will take a look through  
11 it to make sure that we're not causing any problems, but  
12 what I would propose is that those alternative deadlines  
13 and processes apply to all individuals or organizations  
14 that are subject to discovery in this phase.

15 And what I will do is make those modifications,  
16 and then I will circulate this, again, as soon as Susan  
17 Carter is back later this week in draft form to everyone.  
18 And if you have any concerns when you see the draft  
19 language -- and what I will do is I will circulate it both  
20 with the changes clearly indicated and also a copy where  
21 those changes have just been incorporated. So I will  
22 circulate both forms so it's easy for you to determine  
23 where the changes have been made. But, again, if anyone  
24 has any concerns about those, then you'll have the right  
25 to let me know, and I'll take that into account. So I'm

1 not asking you to commit at this point, but I think it  
2 makes more sense.

3 So, Mr. Draper, in that regard, when do you go in  
4 for your shoulder surgery?

5 MR. DRAPER: Tomorrow morning, Your Honor.

6 SPECIAL MASTER THOMPSON: Okay. So with the  
7 recognition that the dates will not change, that I --  
8 dates that I outlined a moment ago will not change, but  
9 that you'll probably want to have an opportunity to just  
10 take a look at the other changes and make sure you're fine  
11 with them before I finalize the plan.

12 Is there a date that I could set, say, I'm  
13 thinking maybe two weeks from Friday, by which everyone  
14 could let me know if they have any concerns with the  
15 proposed language and I'll then finalize it? Would that  
16 be workable for you?

17 MR. DRAPER: Your Honor, yes, it would be. Thank  
18 you.

19 SPECIAL MASTER THOMPSON: Okay. That's what I  
20 will do.

21 Okay. Anything else with respect to the draft  
22 Case Management Plan?

23 If not, that takes me through the specific agenda  
24 items which I had. So are there any other items that the  
25 parties want to raise, that anyone on the call wants to

1 raise?

2 Okay. So the other thing that is provided in the  
3 draft Case Management Plan -- just looking for the  
4 provision right now, okay -- is that once a -- once a  
5 month that each party will file a progress report with me  
6 and that I will then schedule and hold status conferences  
7 as I deem necessary.

8 So my proposal there, again, just to make it  
9 clear, is that we will not have during this discovery  
10 period regular status conferences, but instead what I'm  
11 asking is that each of the parties on a monthly basis  
12 submit a progress report to me. If it appears that it  
13 would be useful to have a status conference, I'll schedule  
14 one. And so if one of the parties wishes to have a status  
15 conference, they should go ahead and state that in that  
16 monthly progress report. Hopefully, that will save time,  
17 and we won't have to be on the phone on a monthly basis  
18 even when we don't have anything to talk about.

19 Okay. So with that in mind, then I will let you  
20 all go back to your other work. And I'll look forward to  
21 speaking to you all again probably sometime in 2012 either  
22 as the renewed motion of Montana or at a status conference  
23 for the hearing of any other motions that the parties  
24 decide to raise in the meantime.

25 And I hope that you all have a great holiday

1 season. Mr. Draper, I hope your operation goes well and  
2 that you recover very quickly.

3 MR. DRAPER: Thank you very much.

4 And I'm sure we all -- everybody joins me in  
5 wishing you a good holiday season in the meantime.

6 SPECIAL MASTER THOMPSON: Okay. Thank you very  
7 much all.

8 - - -

9 (End of proceedings at 9:04 A.M.)

10 - - -

11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

